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10 Attorneys for Plaintiff  
11 Shoreline Capital Management, Ltd.

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN JOSE DIVISION

15 SHORELINE CAPITAL MANAGEMENT,  
16 LTD., a British Virgin Islands company  
17 limited by shares,

18 Plaintiff,

19 vs.

20 XIAOBING SUN, an individual, also  
21 known as DANIEL SUN,

22 Defendant.

No. JW CV 08 0121

DECLARATION OF LINLIN GONG  
SUPPORTING *EX PARTE* APPLICATION  
FOR TRO AND OSC RE PRELIMINARY  
INJUNCTION, AND FOR ORDER  
GRANTING LEAVE TO CONDUCT  
EXPEDITED DISCOVERY

23 I, Linlin Gong, say:

24 1. I am an employee of Guangzhou United (GU), the onshore  
25 agent of Shoreline Capital Consulting (Shenzhen) Co., Ltd. (Shoreline Shenzhen), the  
26 wholly-owned subsidiary of Shoreline Capital Management, Ltd. (Shoreline) that is  
27 the Plaintiff in this action. GU's agency contract with Shoreline Shenzhen is for the  
28 sole purpose of employing Shoreline personnel and it is 100% funded by  
Shoreline. I have personal knowledge of the matters set forth in this Declaration and  
would competently testify to them if called as a witness.

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DECLARATION OF LINLIN GONG SUPPORTING *EX PARTE* APPLICATION FOR TRO  
AND OSC RE PRELIMINARY INJUNCTION, AND FOR ORDER GRANTING LEAVE TO  
CONDUCT EXPEDITED DISCOVERY

1           2. I joined Guangzhou United on February 15, 2006 and am still employed  
2 there at present. In my employment with Guangzhou United, I am an investment manager,  
3 responsible for investment evaluation and acquisition in distressed real estate projects.  
4

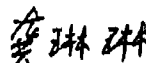
5           3. On February 15, 2006, Guangzhou United and Shoreline delivered to me  
6 the Shoreline Employee Handbook, which, to my knowledge, is delivered to all employees on  
7 their date of hire. It explicitly explained that use of disclosure of its financial analysis models,  
8 Excel work sheets and other relevant documents outside of Shoreline is strictly prohibited.  
9

10           4. Through my observations from February 15, 2006 to the present, I have  
11 found the Excel financial model used by Shoreline to price debt portfolios is the most important  
12 asset/tool of Shoreline. Shoreline's partners and managers try very hard to protect the analysis  
13 tool and, to my knowledge, require persons who wish to view the model to first sign a  
14 confidentiality agreement.  
15

16           5. From September to the present, I have observed that Shoreline strictly guards  
17 as confidential all lists and information related to any potential investment deal from any asset  
18 management company, bank, or other source. I have prepared numerous documents relating to  
19 new potential deals and it is common knowledge within the company that information related to  
20 new investments or investment analysis are strictly confidential and proprietary to the company.  
21

22           I declare under penalty of perjury under the laws of the United States that the  
23 foregoing is true and correct.  
24

25           Executed this 10th day of January, 2008 at Guangzhou, China.

26           

27           Linlin Gong  
28